

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

GERARDO CAMPOS, et al	:	
	:	
Plaintiffs	:	CASE NO. 3:12-cv-01529-PAD –(BJM)
	:	
vs.	:	
	:	
SAFETY-KLEEN SYSTEMS, INC., et al	:	
	:	
Defendants	:	

**PLAINTIFF’S MOTION FOR LEAVE TO FILE REPLY BRIEFS TO DEFENDANTS’
OPPOSITION TO PLAINTIFFS’ MOTION FOR SUMMARY
JUDGMENT/OBJECTION TO MOTION TO STRIKE DR. PETER SHIELDS UNDER
FEDERAL RULE OF EVIDENCE 702 AND *DAUBERT* & REPLY TO DEFENDANTS’
OBJECTION TO PLAINTIFFS’ MOTION TO EXCLUDE THE TESTIMONY OF
JULIE PANKO/MOTION FOR SANCTIONS**

COME NOW the Plaintiffs, by and through their undersigned counsel, and pursuant to Local Rule 7(c) files this, their Motion for Leave to File Reply Briefs to Defendants’ Opposition to Plaintiffs’ Motion for Summary Judgment/Objection to Motion to Strike Dr. Shields under Federal Rule of Evidence 702 and *Daubert* and Reply to Defendants’ Objection to Plaintiffs’ Motion to Exclude the Testimony of Julie Panko/Motion for Sanctions. In support thereof, the Plaintiffs present the following:

1. On July 16, 2014, Defendant Safety-Kleen Systems, Inc. filed their Objection to Plaintiffs’ Motion to Exclude the Testimony of Julie Panko and Motion for Sanctions (D.E. 138).
2. On July 17, 2014, Defendant, Safety-Kleen Systems, Inc. filed their Opposition to Plaintiffs’ Motion for Summary Judgment/Objection to Motion to Strike Dr. Peter Shields under Federal Rule of Evidence 702 and *Daubert* (D.E. 144).
3. The Plaintiffs’ Motion to Strike the Testimony of Julie Panko and Motion for Sanctions (D.E. 110) and Plaintiffs’ Motion for Summary Judgment Regarding Dr. Shields’ Causation Opinion and Motion to Strike Dr. Shields’ Testimony pursuant to Federal Rule of Evidence 702 (D.E. 111), did not address the issues raised in Defendants’ Oppositions, and the Plaintiffs seek leave of Court to file their accompanying Reply Briefs.

WHEREFORE, the Plaintiffs, request leave of Court to file their Reply Briefs to Defendants' Opposition to Plaintiffs' Motion for Summary Judgment/Objection to Motion to Strike Dr. Shields under Federal Rule of Evidence 702 and *Daubert* and Reply to Defendants' Objection to Plaintiffs' Motion to Exclude the Testimony of Julie Panko/Motion for Sanctions.

Respectfully submitted,

/s/ Michael A. Robb

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**COUNSEL FOR
PLAINTIFFS**

CERTIFICATE OF SERVICE

That on July 28, 2014, I electronically submitted the foregoing document with the clerk of the court for the U.S. District Court, District of Puerto Rico, using the electronic case filing system of the court. I also certify that the foregoing document is being served this day on all counsel of record identified on the attached Service List in the manner specified, either via transmission of Notice of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Filing.